

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SARAH PALIN, an individual,

Plaintiff,

— v —

THE NEW YORK TIMES COMPANY,
a New York corporation, and
JAMES BENNET, an individual,

Defendants.

No. 17 Civ. 4853 (JSR)

ECF Case

JOINT UPDATED TRIAL WITNESS DISCLOSURE

Pursuant to the Court's instruction on January 24, 2022, Plaintiff, Sarah Palin, and Defendants, The New York Times Company and James Bennet, hereby make their updated trial witness disclosure and states as follows:

WITNESS LIST IN THE LIKELY ORDER OF APPEARANCE

1. Elizabeth Williamson
2. Phoebe Lett
3. Eileen Lepping
4. Linda Cohn
5. James Bennet
6. Justin Stile
7. Ross Douthat [Will not be called until the morning of February 8, 2022 at earliest]
8. Andrew Sullivan (Video Depo)
9. Tim Crawford (Video Depo)
10. Gov. Sarah Palin
11. Hanna Ingber
12. Danielle Rhoades Ha
13. Sebastian Tomich

The parties reserve the right to amend or supplement these disclosures to the extent necessary and permitted due to witness availability issues or other unforeseen circumstances..

February 1, 2022.

For Plaintiff:

TURKEL CUVA BARRIOS, P.A.

/s/ Shane B. Vogt

Kenneth G. Turkel (admitted *pro hac vice*)
Email: kturkel@tcb-law.com
Shane B. Vogt (admitted *pro hac vice*)
Email: svogt@tcb-law.com
100 North Tampa Street, Suite 1900
Tampa, Florida 33602
Tel: (813) 834-9191
Fax: (813) 443-2193

Michael M. Munoz
E-mail: mmunoz@golenbock.com
Golenbock Eiseman Assor Bell & Peskoe LLP
711 Third Avenue
New York, NY 10017
Tel: (212) 907-7300
Fax: (212) 754-0330

Counsel for Plaintiff

Respectfully submitted,

For Defendants:

BALLARD SPAHR LLP

By: /s/ David L. Axelrod

David L. Axelrod
Jay Ward Brown
Thomas B. Sullivan
Jacquelyn N. Schell
1675 Broadway, 19th Floor
New York, NY 10019-5820
Phone: (212) 223-0200
Fax: (212) 223-1942
brownjay@ballardspahr.com
axelrodd@ballardspahr.com
sullivant@ballardspahr.com
schellj@ballardspahr.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that the Joint Updated Trial Witness Disclosure was filed electronically on February 1, 2022. This Notice will be sent by operation of the Court's electronic filing system to counsel of record for all parties as indicated on the electronic filing receipt. Parties and their counsel may access this filing through the Court's system.

/s/ Shane B. Vogt

Attorney